

# **EXHIBIT 7**

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ECHOTA C. WOLFCLAN, on behalf of  
himself and other similarly situated  
individuals,

Plaintiffs,

vs.

PIERCE COUNTY, et al.,

Defendants.

NO. 23-cv-5399-TSZ-SKV

PLAINTIFF ECHOTA WOLFCLAN'S FIRST  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION TO DEFENDANTS

**AND FOURTH SUPPLEMENTAL  
ANSWERS THERETO RE: ROG 6, RFP 6  
& RFP 17**

COME NOW the Defendants by and through their attorneys, Prosecuting Attorney Mary E. Robnett and Deputy Prosecuting Attorney Frank Cornelius to answer Plaintiff Cynthia Fajardo's First Set of Interrogatories and Requests for Production Propounded to Defendant Pierce County.

**PRELIMINARY STATEMENT**

It should be noted that these responding parties have not completed their investigation of facts related to this case or their discovery and have not completed their preparation for trial. All of the answers contained herein are based only upon such information and documents that are presently available to and specifically known to these responding parties.

It is anticipated that further discovery, independent investigation, legal research, and

analysis will supply additional facts, add meaning to the known facts, as well as establish entirely new factual conclusions, all of which may lead to substantial additions to, changes in, and variations from the contentions herein set forth.

Therefore, the following interrogatory responses are given without prejudice to the responding parties' right to produce evidence of any subsequently discovered fact or facts which they may later obtain. The responding parties accordingly reserve the right to change any and all answers herein when additional facts are ascertained, analyses are made, legal research is completed, and contentions are made. The answers contained herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as is presently known but should in no way be to the prejudice of these responding parties in relation to further discovery, research, or analysis.

### **GENERAL OBJECTIONS**

Defendants object generally to Plaintiff's prefatory instructions and definitions, to the extent they purport to require more than the civil rules for discovery. Defendants neither agree nor stipulates to the preceding definitions and procedures. All answers are provided pursuant to FRCP 26(b). Defendants assert the following additional general objections:

1. **Limitations on Discovery.** This case is currently a single action. Plaintiff Wolfclan seeks to certify a class defined as:

All detainees held in the Pierce County Jail, Cell Block 3 North A from April 8, 2023, until the present, and any other cell blocks having unremedied plumbing defects leading to the same, similar, or worse living conditions, and all detainees who will be held in those cells blocks in the future ("the Plaintiff Class").

Plaintiff's class definition is overly broad and vague. Class certification has not been decided by the Court.

1           2. **Relevance and Scope.** Defendants object to Plaintiff's First Set of Interrogatories and  
 2 Requests for Production because, as written, they are overly broad, vague, and unduly burdensome,  
 3 many are duplicative and/or seek duplicative information, seek information or documentation not  
 4 relevant to the subject matter of this action, and are not reasonably calculated to lead to the  
 5 discovery of admissible evidence.

6           3. **Proportionality.** Defendants object to Plaintiff's First Set of Interrogatories and  
 7 Requests for Production as overly broad and unduly burdensome because, as written, they would  
 8 require extensive, unreasonable, expensive, and labor-intensive investigation that is out of  
 9 proportion to, and cannot be justified in light of, Plaintiff's claims. See Fed. R. Civ. P. 26(b)(2)(C).

10           4. **Undue Complexity and/or Additional Obligations.** Defendants object to Plaintiff's  
 11 First Set of Interrogatories and Requests for Production to the extent they seek to impose discovery  
 12 obligations above and beyond those imposed by the Federal Rules of Civil Procedure and the Local  
 13 Rules.

14           5. **Privilege and Disclosure Limitations.** Defendants object to Plaintiff's First Set of  
 15 Interrogatories and Requests for Production to the extent they seek information protected from  
 16 disclosure by privileges and other protections from production including, without limitation, the  
 17 attorney-client privilege, the work-product doctrine, or any other constitutional, statutory, common  
 18 law or regulatory protection, limitation, immunity or proscription from disclosure. Defendants do  
 19 not intend the inadvertent disclosure of any privileged or private and protected information to  
 20 constitute waiver of Defendants' rights to assert any applicable privilege or protection with respect  
 21 to any such information or any other matter.

22           6. **Supplementation.** It should be noted that Defendants have not completed their  
 23 investigation of facts related to this case or its discovery and have not completed their preparation  
 24 for trial. In addition, class certification has not been determined. It is anticipated that further

1 discovery, independent investigation, legal research, and analysis will supply additional facts, add  
2 meaning to the known facts, as well as establish entirely new factual conclusions, all of which may  
3 lead to substantial additions to, changes in, and variations from the answers herein set forth.

4 Therefore, Defendants do not waive any right to produce evidence of any subsequently  
5 discovered fact or facts which it may later obtain. Defendants accordingly reserve the right to make  
6 additional objections and supplement answers to discovery requests when facts and/or additional  
7 facts are ascertained, analyses are made, legal research is completed, and contentions are made.

### 8 **INTERROGATORIES**

9 **INTERROGATORY NO. 1:** Describe each individual Defendant's work history from  
10 2012 to Present, including, but not limited to each employer, job title, business address, immediate  
11 supervisor, dates of employment, compensation, and reason(s) for leaving.

#### 12 **ANSWER:**

13 Objection overly broad, beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to  
14 discovery of admissible evidence. In particular, employment and personnel file information is not  
15 relevant to the subject litigation, including but not limited to compensation. This request is invasive  
16 of the individual Defendants' right to privacy and raises concerns regarding safety of individual  
17 Defendants because they are correctional deputies and/or employees of the Pierce County Sheriff  
18 Department. Objection to the extent that the discovery request seeks information related to  
19 employment outside of Pierce County and such information would not be in the care, custody or  
20 control of the Defendants. Further objection, outside the scope of class certification question.  
21 Without waiving objections, and limiting answer to the time period of April 8, 2020, to the date of  
22 the initial Complaint May 2, 2023, please contact defense counsel to discuss answer subject to  
23 protective order.

1 SUPPLEMENTAL ANSWER 08/09/2024:

2 Patti Jackson: Job Title: Pierce County Patrol Bureau Chief Patti Jackson; Address: c/o  
3 Frank Cornelius Pierce County Deputy Prosecuting Attorney; Supervisor: Ed Troyer; currently  
4 employed and employed during the above time period as Chief of Corrections; compensation  
5 \$215,940.27 (annual salary).

6 Ed Troyer: Job Title: Pierce County elected Sheriff – employed during the above time  
7 period; Address: c/o Frank Cornelius Pierce County Deputy Prosecuting Attorney; currently  
8 employed and employed during the above time period as the Sheriff’s Department public  
9 information officer; compensation \$191,099.85 (annual salary).

10 Captain Matthew Dobson: Job Title: Captain Corrections; Address: c/o Frank Cornelius  
11 Pierce County Deputy Prosecuting Attorney; Supervisor: Kevin Roberts; currently employed and  
12 employed during the above time period; compensation \$178,120.38 (annual salary).

13 Sergeant Anthony Mastandrea: Job Title: Sergeant Corrections—employed during the  
14 above time period; Address: c/o Frank Cornelius Pierce County Deputy Prosecuting Attorney;  
15 Supervisor: Stacie Woodley; not currently employed at Pierce County – separation date 6/28/2024;  
16 salary \$60.02 per hour.

17 **INTERROGATORY NO. 2:** Identify all individuals who have been employed or  
18 contracted to perform maintenance of toilets or plumbing at Pierce County Jail since 2012,  
19 including whether the individual is directly employed by Pierce County or is a contractor. For  
20 contracted individuals, identify the name and address of his/her employer. For each individual  
21 listed, whether employee or contractor, include the full name and dates he/she worked at Pierce  
22 County Jail.

23 ANSWER:

24

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. The discovery request is vague as to “maintenance of toilets or plumbing.” Further objection, outside the scope of class certification question, and the request is disproportionate to the needs of this case. Without waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020 to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

SUPPLEMENTAL ANSWER 08/15/2024: Pierce County maintenance employees are as follows: Scott Krupa, Robert Soule, Jaysen Render, Tony Bernal, Ricardo Vazquez, Scott Jones, Thay Phok. Identification of outside contractors requires a Facilities Mgt. ESI search. Targeted search terms are necessary. As of the date of this supplement, Plaintiff has not provided search terms.

**INTERROGATORY NO. 3:** Identify all individuals who have been employed or contracted to perform maintenance of grievance kiosk systems at Pierce County Jail since 2012, including whether the individual is directly employed by Pierce County or is a contractor. For contracted individuals, identify the name and address of his/her employer. For each individual listed, whether employee or contractor, include the full name and dates he/she worked at Pierce County Jail.

ANSWER:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. The

discovery request is vague as to “maintenance of grievance kiosks systems.” Further objection, outside the scope of class certification question, and the request is disproportionate to the needs of this case. Without waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020 to the date of the initial Complaint May 2, 2023: This discovery request to be supplemented.

8/2/24 SUPPLEMENTAL ANSWER:

Katie Flores  
Aramark  
6311 Inducon Corporate Dr., Ste. #6  
Sanborn, NY 14132

Do not have dates of employment.

**INTERROGATORY NO. 4:** Describe the policy and/or procedure that Pierce County Jail has in place to address when a correctional officer or any other employee receives a complaint from an inmate regarding sanitation conditions in a cell, including but not limited to complaints about plumbing, toilets, sewage, and/or unsanitary living conditions. Include any change(s) in policy that has occurred, including but not limited to during and in response to the COVID-19 pandemic.

ANSWER:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Objection vague as to “complaint,” “sanitation conditions,” “complaints about plumbing, toilets, sewage, and/or unsanitary conditions.” The discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Further objection, outside the scope of class certification question, and the request is disproportionate to the needs of this case. Without waiving objections,



1 the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: See Request for  
2 Production No. 4.

3 **INTERROGATORY NO. 5:** Identify each documented instance that an inmate,  
4 including but not limited to Plaintiff, has complained about unsanitary living conditions, including  
5 complaints about plumbing, sewage, and/or the toilets at Pierce County Jail, whether by formal  
6 grievance or otherwise, at any point since 2012 to Present.

7 **ANSWER:**

8 The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly  
9 broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible  
10 evidence. The request is disproportionate to the needs in this case and seeks information that would  
11 not be relevant to the claims and defenses in this litigation. Objection to the extent that the  
12 discovery request seeks attorney-client and/or work product. Objection vague as to “complained  
13 about unsanitary living conditions,” “complaints about plumbing, sewage, and/or toilets.” The  
14 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15,  
15 16, 18. Without waving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA  
16 and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to  
17 identify potential responsive information, the discovery request implicates ESI protocol.  
18 Supplement pending ESI protocol finalization.

19 **INTERROGATORY NO. 6:** Identify each employee who has worked in any capacity  
20 with inmates housed in the Mental Health Unit(s), including Unit 3 North A, of the Pierce County  
21 Jail, including but not limited to Correctional Officers and/or guards, psychiatrists, and other  
22 Mental Health staff (e.g. “MHP”), since 2012 to Present. For each, include the individual’s full  
23 name, job title, duties and responsibilities, immediate supervisor, and dates of employment.

24 **ANSWER:**

1           Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
 2 to discovery of admissible evidence. Objection vague as to “any” capacity. The request is  
 3 disproportionate to the needs in this case and seeks information that would not be relevant to the  
 4 claims and defenses in this litigation. Objection to the extent that the discovery request seeks  
 5 information related to employment outside of Pierce County, including but not limited to  
 6 NaphCare workers, and such information would not be in the care, custody or control of the  
 7 Defendants. Further objection, outside the scope of class certification question, and the request is  
 8 disproportionate to the needs of this case. Without waiving objections, and limiting answer to  
 9 name and title, Jail location 3NA and the time period of April 8, 2020 to the date of the initial  
 10 Complaint May 2, 2023:

11           8/2/24 SUPPLEMENTAL ANSWER:

12           Correctional Staff:

13   Yelle, Rachel Annette  
 14   Friermuth, Kenneth Dale  
 15   Tunnell, Grady Wayne  
 16   Erwin, Christopher Peter  
 17   Carn, Donald Lee  
 18   Guiler, Yolanda Juanita  
 19   Tveit, Wendy A  
 20   Pearson, Torvald A  
 21   Berry, Stephen Robert  
 22   Jenkins, Daniel Lee  
 23   Clawson, Russell O  
 24   Crews, Josef Michael  
    Brown, Timothy Ray  
    Bautista, Alvin Balansay  
    Macoy, Kelly S  
    Rethaford, Jay Andrew  
    Hersey, Dayna Louise  
    Marler, Boyd Aaron  
    Wells, Kurtis Anthony  
    Chung, David Gentaro  
    Sturtz, Eric Linn  
    Defilippis, Larry  
    Burdick, Scott Leroy

1 Raschko, Ryan Michael  
Swick, James Leslie  
2 Thompson, Erika Leigh  
Sandoval, Peter Paul  
3 Brandt, Kari Kay  
Warren, Howard James  
4 Larsen, Jennifer Lynn  
Lyon, Teresa Lynn  
5 Wilson, Peter Alvin  
Cooley, Christopher Lee  
6 Collins, Crystal Lynn  
Watson, Matthew Warren  
7 Stuckert, Thomas Edward  
Langford, Jesse Lee  
8 Stone, Laura Lea  
Hamilton, Laura Lea  
9 Jones, Paul Robert  
Ferrell, Anthony Craig  
10 Newkirk, Jonathan David  
Chojnowski, Christopher T  
11 Mock, Dawn Delynn  
Starks, Stanley R  
12 Ramos, Tonya Jo  
Dixon, Deneen Angelica  
13 Cherry, Steven Antonio  
Fields, Walton Christopher  
14 Wales, Kent Dominic  
Starks, William David  
15 Oeltjen, Julie Anne  
Quiero, Melvyn Francisco  
16 Vadala, Donavan Joseph  
Rankin, Lynette Patrice  
17 Jackson, Troy Anthony  
Hernandez, Hector Rafael  
18 Vicente, Janis  
Bundy, Chandra Lynn  
19 Morton, Deborah  
Herbison, Kristi Lyn  
20 Thompson, Benjamin Allen  
Clostio, Troy Clint  
21 VanWinkle, Russell Dell  
Miller, Robert Edward  
22 Hopkins, Deborah Lynn  
Desilet, Colleen Laura  
23 Perry, Scott  
Nishi, Heidemarie  
24 Cavelti, Aaron Anthony

1 Belmudes, Stacy Dale  
 Temple, Ronald Craig  
 2 Zambrana, Neftaly  
 Correll, Edward Luther  
 3 Lynam, Dana Robert  
 Hicks, Andy Jackson  
 4 Lampman, Michael Shawn  
 Anton, Patricia Elise  
 5 White, Laurentine Lynn  
 Devyak, Mark Douglas  
 6 Lyon, John David  
 Sawyer, Bryce Sly  
 7 Wade, Brad Jerone  
 Hamilton, Eric Glen  
 8 Scott, Craig Allan  
 Theodorson, John Bernard  
 9 Graham, David Neil  
 Stanley, Philip Robert  
 10 Skevington, Richard Dale  
 Petersen, Michael James  
 11 Benson, Byron Christopher  
 Thomsen, Benjamen Ejgil  
 12 Torres, Peter B  
 Lee, Nicholas David  
 13 Gannon, Shirley Marie  
 Russell, William Charles  
 14 Buchanan, Steven Phillip  
 Oeltjen, Rickie Lee  
 15 Peek, Michael Wayne  
 Rankin, Tim Wayne  
 16 Schooley, Michael John  
 Azcueta, Raul Ricky-Morales  
 17 Cruz, William Ramon  
 Prince, Terry Gene  
 18 Cherry, Sandra Marie  
 Blind, Jonathan Henry  
 19 Boyle, Jesse Alan  
 Kavanaugh, Eric Paul  
 20 McLane, Joshua Patrick  
 Berwick, David Alan  
 21 Maldonado, Edwin  
 Davis, Glen William  
 22 Davis, Roger Lamont  
 Severson, Rocklin Jock  
 23 Brink, Robert Joseph  
 Place, Jessica Leigh  
 24 McWilliams, Carleen Loree

1 Buckingham, Bryan Richard  
 Allen, Ruth Ann Marie  
 2 Harris, Jarvis Levin  
 Brown, Donald Garrett  
 3 Schiedeck, Kevin Allen  
 Earp-Peck, Elizabeth Wyatt  
 4 Desmond, Robert Calvin  
 Shanahan, Lisa Lynn  
 5 Shaw, Jeremy Damon  
 Haley, Jason Jerrodd  
 6 Stimer, John William  
 Blowers, James Mileum  
 7 Mareko, Faafetai Navy  
 O'Neill, Alan Leighton  
 8 Whitehead, Matthew  
 White, Anthony Arnett  
 9 Wagoner, Michael Henry  
 Gardner, Craig Hamilton  
 10 Hollis, Matlean Melva  
 Ashley, Cameron Louis  
 11 Valdez, Luz Maria  
 Hall, Christopher James  
 12 Graham, Richard Joseph  
 Volk, Keith J  
 13 Tenney, Heidi Samantha  
 Byrer, Phillip  
 14 Stephens, Heidi Samantha  
 Graham, Antonio Duane  
 15 Williams, Alec G  
 Reyes-Blind, Yolanda  
 16 Hansen, John Oscar  
 Conaway, Sean Patrick  
 17 Olson, Cody Matthew  
 Crist, Christopher Jay  
 18 Golden, Precola Angelica  
 Score, Aaron Anthony  
 19 Thomas, Precola Angelica  
 Adams, John Douglas  
 20 Jackson, Jerome Marco  
 Papp, Ferenc Gabor  
 21 Frizzell, Joshua Dan  
 Paul, David William  
 22 Griswold, Mariana L.  
 Dooley, Jared Duncan  
 23 Justiniano, Maria Mignon  
 Mulrine, Maria Mignon  
 24 Neils, Erik Gene

1 Wilkins, Nathan  
Cruz, Jordan  
2 Sidibe, Nouhoum  
Miller, Davon  
3 Lincoln, Kendal  
Ortiz-Rosado, Carlos  
4 Moreno, Mario  
Paukert, Jacob  
5 Peters, Joseph  
Miller, Roger  
6 Klein, Mark  
Forrey, Robin  
7 Langowski, Adam  
Cropp, Jeffrey  
8 Kim, Byong  
Delgado, Steven  
9 Papp, Morgan  
Fountain, Morgan  
10 Knight, Jonathon  
Morse, Daniel  
11 Borrero, Flor  
Rogers, Colton  
12 Duffy, Jeremie  
Lunau, Brenda  
13 Sollars, Matthew  
Tirado-Mendez, Juan  
14 Velleses, Kimo  
Bortle, Leanna  
15 Castro, Lisandro  
Bonney, Steven  
16 Lin, Lin  
Trussell, Douglas  
17 Rankin, Ray  
Spieth, Jorden  
18 Hayes, Travis  
Spanier, Austin  
19 Rosenthal, Andrew  
Bradley, Jonah  
20 Strunk, Aurora  
Berry, David  
21 Johnson, Nicholas  
Maulin, Zachary  
22 Garlock, Cameron  
Davis, Richard  
23 Than, Sophal  
Perry, Garrett  
24 Nellenbach, Thomas

1 Sapp, Dillion  
Clark, Trevor  
2 Barrett, Joseph  
Lincoln, Charles  
3 Pham, Phi  
Owen, Steven  
4 Tucker, Amber  
Yi, Ki  
5 Haynes, Drajuan  
Hayes, Donerick  
6 Laliberte, Kailee  
Smith, Jason  
7 Winfree, Ryan  
Fowler, Andrew  
8 Falzone, Gianni  
Uti, Aleki  
9 Herr, Trey  
Hoffman, Tonia  
10 Cridge, Jamie  
Fien, Anthony  
11 Mantenga, Rebekka  
Harper, Jonathan  
12 Music, Austin  
Cote, Nathan  
13 Aguilar, Truman  
Boudinot, Truman  
14 Craugh, Casey  
Conn, Dakota  
15 Frye, Randolph  
Willis, Kimberly  
16 Torres, Iris  
Boggan, James  
17 Aroche, Andres  
Scott, Audria  
18 Oleson-Borland, Tatanie  
Peck, Denise  
19 Chester-Branham, Hope  
Kim, Jungeun (Angela)  
20 Jones, Garrett  
Tomas Gaspar, Alexander  
21 McBride, Sagrario  
Ramos, Mark A. Jr  
22 Preslar, Merle E.  
Sanders, Dylan L.  
23 Sainati, Angela A.  
Williams, Sean L.  
24 Raplee, Justin Dakota

1 Smith, Rachel Nicole  
Hamilton, Jeff Craig  
2 Scott, Jasmine Tatiyana  
Avega, Shanlynn Fetu Lokahi  
3 Crockett, Christopher Walter  
Buabeng, Eugene Anyan  
4 Hassan, Ahmed Mohamed  
Salman, Jan J.  
5 Fermin-Henry, Patricia  
Abel, Dylan John  
6 Barrett, James Andrew  
Watson, Orrett Henry  
7 Ferguson, Michelle D.  
Piland, Joshua  
8 Braswell, Timothy Sabrina  
Johnson, Douglas K.  
9 Stenzel, Gail A.  
Sadlier, Philip S.  
10 Wasson, George W.  
Herbison, Darryl S.  
11 Smith, Preston L.  
Alexander, Dione  
12 Schultz, David D.  
Mastandrea, Anthony Michael  
13 Caruso, Jackie Anne  
Ake, Forest Scott  
14 Woodley, Stacie Lynn  
Graham, Michele  
15 Watkins, Douglas Lee  
Pihl, Tamara Kay  
16 Ristine, Andrew Lewis  
Duray, Jerome Justin  
17 Lee, Il-Sop  
Conuel, Brian Edward  
18 Blowers, Brian Albert  
Allen, Alvin Russell  
19 Wade, Adam Cedric  
Aaron, Bryan  
20 Finley, Jason Matthew  
Stanley, Philip Robert  
21 Lynam, Dana Robert  
Miller, Robert Edward  
22 Blind, Jonathan  
Shanahan, Lisa  
23 Davis, Glen William  
Russell, William Charles  
24 Lincoln, Kendal



Buchanan, Steven Phillip

Medical Staff:

Isoken Ogiesora LPN

Mariena Mears NP

Veronica Slaughter Pharmacist

Lynette Hunt Medical Records Clerk

Maria Rader LPN

Azusa Matsubayashi Psych NP

Melanie Contreras LPN

Rochelle Hill LPN

Nicholas Moses LPN

Genevieve Herbrand LPN

Natalie Langel RN

Victoria Straus RN

Sarah Harbor LPN

Cameron Carrillo LPN

Ashley Valencia Chalk RN

Jesus Paez LPN

Robert Wargacki RN

Elyssa Manford LPN

Jazmine Marion LPN

Ruth Muuru MHP

Megan Hamel MHP

Ilene Anderson MHP

Kathryn Riley LPN

Constance Burden LPN

Revekka Pronina LPN

Duane Collins RN

Alisha Hughes RN

Alexander Jones RN

Lindzie Boyd RN

Angela Williams-Purdy LPN

Gwynne Crandall Mental Health Office

Administrator

Jonathon Slothower HSA

Angela Valencia DON

Jesus Perez MHP

Maria Surla LPN

Jennifer Hagara LPN

Rose Rains Charge Nurse RN

Marlita Tresch Pharmacy Tech

Jason Wiggins RN

Katy Mcfarlin RN

Miguel Balderrama Medical Director

**CORRECTION AND SUPPLEMENTAL ANSWER 8/22/2024:**

**Medical Staff:**

**Pierce County Employees:**

**Ilene Anderson – MHP; supervisor Karen Bier  
Ruth Muuru – MHP; supervisor Karen Bier  
Megan Hamel – MHP; supervisor Karen Bier  
Gwynne Crandall – Office Admin.; supervisor Karen Bier  
Angela Valencia – Director of Nursing  
Miguel Balderrama - Medical Director**

**See also Request for Production No. 6 supplemental Job Classification materials for job duties and responsibilities. See Request for Production No. 6 Excel spreadsheets previously supplemented for correctional staff job titles, immediate supervisor, and dates of employment in the 3NA section of the jail from April 8, 2020 to May 2, 2023.**

**Naphcare Contract Employees:**

**Isoken Ogiesora LPN  
Mariena Mears NP  
Veronica Slaughter Pharmacist  
Lynette Hunt Medical Records Clerk  
Maria Rader LPN  
Azusa Matsubayashi Psych NP  
Melanie Contreras LPN  
Rochelle Hill LPN  
Nicholas Moses LPN  
Genevieve Herbrand LPN  
Natalie Langel RN  
Victoria Straus RN  
Sarah Harbor LPN  
Cameron Carrillo LPN  
Ashley Valencia Chalk RN  
Jesus Paez LPN  
Robert Wargacki RN  
Elyssa Manford LPN  
Jazmine Marion LPN**

1 **Kathryn Riley LPN**  
**Constance Burden LPN**  
 2 **Revekka Pronina LPN**  
**Duane Collins RN**  
 3 **Alisha Hughes RN**  
**Alexander Jones RN**  
 4 **Lindzie Boyd RN**  
**Angela Williams-Purdy LPN**  
 5 **Jonathon Slothower HSA**  
**Jesus Perez MHP**  
 6 **Maria Surla LPN**  
**Jennifer Hagara LPN**  
 7 **Rose Rains Charge Nurse RN**  
 8 **Marlita Tresch Pharmacy Tech**  
**Jason Wiggins RN**  
 9 **Katy Mcfarlin RN**

10 **INTERROGATORY NO. 7:** Identify and describe each instance in which any portion of  
 11 the plumbing at Pierce County Jail has been inspected, repaired, or replaced since 1985 to Present.

12 **ANSWER:**

13 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
 14 to discovery of admissible evidence. Objection overly broad as to “any portion of the plumbing”  
 15 and vague as to “each instance,” “inspected, repaired, or replaced.” The request is disproportionate  
 16 to the needs in this case and seeks information that would not be relevant to the claims and defenses  
 17 in this litigation. Objection to the extent that this discovery request is/would be duplicative to  
 18 Interrogatory No. 9 and Request for Production No. 9, 15, 20, 31. Without waiving objections  
 19 and limiting answer to Jail location 3NA and the time period of April 8, 2020 to the date of the  
 20 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery  
 21 request implicates ESI protocol. Supplement pending ESI protocol finalization.

22 **INTERROGATORY NO. 8:** Identify how many inmates have been housed in the area  
 23 that is currently known as Unit 3 North A from 2012 to Present.

24 **ANSWER:**

1 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
 2 to discovery of admissible evidence. The discovery request also implicates RCW 70.28.100 and  
 3 privacy protection. Without waiving objections and limiting answer to Jail location 3NA and the  
 4 time period of April 8, 2020 to the date of the initial Complaint May 2, 2023: To be supplemented.

5 8/2/24 SUPPLEMENTAL ANSWER:

6 472

7 **INTERROGATORY NO. 9:** Identify and describe any and all studies and/or cost  
 8 estimates that have been provided to Pierce County and/or Pierce County Jail since 1985 to Present  
 9 regarding the plumbing and/or toilets at Pierce County Jail. For each, describe the anticipated cost  
 10 of replacing the toilets and/or plumbing, the decision that was made regarding whether to replace  
 11 the toilets and/or plumbing, why the decision was made, and who made the decision.

12 ANSWER:

13 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
 14 to discovery of admissible evidence. Objection overly broad and vague as to “studies and/or cost  
 15 estimates,” “plumbing and/or toilets” and timeframe. Objection to the extent that this discovery  
 16 request is/would be duplicative to Interrogatory No. 7. The request is disproportionate to the needs  
 17 in this case and seeks information that would not be relevant to the claims and defenses in this  
 18 litigation. Without waiving objections and limiting answer to Jail location 3NA and the time  
 19 period of April 8, 2020 to the date of the initial Complaint May 2, 2023: In order to identify  
 20 potential responsive information, the discovery request implicates ESI protocol. Supplement  
 21 pending ESI protocol finalization. See also Defendants’ Initial Disclosures Bates No. 400412-  
 22 400424.

23 **INTERROGATORY NO. 10:** Identify and describe all policies regarding the cleaning  
 24 of cells in Pierce County Jail, including the process by which an inmate can request and receive

1 cleaning supplies for his or her cell, the hours the supplies are available, whether supervision is  
2 required while an inmate uses the supplies, when and for what reason cleaning supplies may be  
3 denied, and whether the process for obtaining and/or the availability of cleaning supplies differs  
4 between various units in the Jail, and if so, describe the differences and reasons for those  
5 differences.

6 ANSWER:

7 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
8 to discovery of admissible evidence. Objection overly broad and vague as to “cleaning of cells.”  
9 Without waiving objections: See Request for Production No. 10.

10 **INTERROGATORY NO. 11:** Identify and describe each instance that an inmate,  
11 including but not limited to Plaintiff, was denied the ability to submit a grievance about unsanitary  
12 living conditions at Pierce County Jail from 2012 to Present. For each instance, describe the reason  
13 for the denial and what, if any, alternative option for filing a grievance was provided to the inmate.

14 ANSWER:

15 Objection assumes facts not in evidence. Objection overly broad and beyond the scope of  
16 Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Objection vague  
17 regarding “unsanitary living conditions.” The discovery request also implicates RCW 70.28.100  
18 and privacy protection. Objection to the extent this discovery request seeks an admission. Further  
19 objection, outside the scope of class certification question, and the request is disproportionate to  
20 the needs of this case. Without waiving objection and limiting answer to Plaintiff Wolfclan,  
21 Plaintiff Wolfclan was not denied the ability to submit a grievance.

22 **INTERROGATORY NO. 12:** Identify the factual basis for Defendants’ denial of  
23 Paragraph 60 to Plaintiff’s Amended Complaint (Dkt. 107), filed May 10, 2024, and Defendant’s  
24 contention that “Plaintiff misrepresents a 2014[] engineering report regarding water closet

placement,” as stated in Defendant’s proposed Joint Status Report and Discovery Plan.

ANSWER:

Objection to the extent that the discovery request seeks attorney-client and/or work product. Objection, relevance. Without waiving objection, the cited report speaks for itself.

**INTERROGATORY NO. 13:** Identify the factual basis for each of Defendants’ pleaded affirmative defenses, as stated on pages 13 through 14 of their Answer (Dkt. 107), filed May 10, 2024.

ANSWER:

Plaintiff’s discovery request represents distinct and separate subjects. Fed. R. Civ. P. 33(a)(1) (“a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts.”). Defendants assert 15 affirmative defenses and answers regarding the factual basis for each affirmative defense require 15 distinct answers. See *Brutscher v. GEICO General Ins. Co.*, 2015 WL 11921416, at \*2 (Interrogatory No. 14 regarding factual basis for each affirmative defense asserted); See also *Grigsby v. Young Men’s Christian Assoc. of Greater Seattle*, 2023 WL 3761945. Defendants object to the extent that Plaintiff’s discovery request exceeds the number of interrogatories allowed under Rule 33. In addition, to the extent that an affirmative defense relates to class action, answer and/or additional answer need not be made until the Court decides the class certification issue. Fed. R. Civ. P. 33(a)(2); see *Wilcox v. Swapp*, 2018 WL 8244005, at \*4. Further objection based on attorney-client and/or work product privileges. Without waiving objections, Defendants state:

1. FAILURE TO EXHAUST ADMINISTRATIVE REMEDIES: The Plaintiff has failed to exhaust administrative remedies and the action will not lie. Plaintiff did not file a grievance regarding the allegations in this lawsuit.

2. FAILURE TO STATE A CLAIM: The Plaintiff has failed to state a claim upon which

relief may be granted, including but not limited to individual participation by defendants in this lawsuit, including but not limited to Sheriff Ed Troyer, Chief Patti Jackson, Cpt. Matthew Dobson, and Sgt. Anthony Mastandrea, and basis to establish standing regarding areas of the jail outside of 3NA.

3. FRIVOLOUS AND/OR MALICIOUS CLAIM: Printed words including but not limited to false allegations, history that surrounds filing, and tone of allegations show maliciousness. The plumbing system in Cell Block 3 North A is built to code and there are no harmful gases. Plaintiff misrepresents a 2014, engineering report regarding water closet replacement. Plaintiff has encouraged other inmates to duplicate or imitate his false claims.

4. NO NOTICE OF DEFECT: Defendant Pierce County had no reasonable notice of the defect alleged herein. Plumbing in 3NA is built to code.

5. NO CLAIM FILING AS REQUIRED BY RCW 4.96.020: Withdrawn.

6. NO PERSONAL FAULT: No violation(s) of constitutional rights by personal actions of individual defendants. Plaintiff fails to plead individual fault by named defendants.

7. QUALIFIED IMMUNITY: Defendants are entitled to qualified immunity as to both state and federal claims. Defense speaks for itself.

8. REASONABLE CARE: Defendants' actions were reasonable, and they did not act with deliberate indifference. Defense speaks for itself.

9. DISCRETIONARY IMMUNITY: Defendant(s) state that all actions of Defendants alleged as negligence, manifests a reasonable exercise of judgment and discretion by authorized public officials made in the exercise of governmental authority entrusted to them and are neither tortious nor actionable. Defense speaks for itself.

10. GOOD FAITH: Defendants at all times acted in good faith in the performance of their

1 duties and is therefore immune from suit for the matters charged in Plaintiff's  
 2 Complaint. Defense speaks for itself.

3 11. NEGLIGENCE/INTENTIONAL ACT OF THIRD PARTY OR PARTIES:

4 Defendants state that any alleged damages and/or injuries, if any, claimed by the  
 5 Plaintiff were proximately caused or contributed to by the negligence and/or intentional  
 6 conduct of another/others, including but not limited to other inmates who clog their cell  
 7 toilet/plumbing, and not from any act or omission by Defendants.

8 12. COMPARATIVE FAULT: Plaintiff's alleged injuries and damages, if any, were  
 9 proximately caused or contributed to by the fault of Plaintiff, including but not limited  
 10 to clogging his cell toilet.

11 13. COLLUSION: Plaintiff's claims are based on a conspiracy to deceive. Plaintiff has  
 12 encouraged other inmates to duplicate or imitate his false claims.

13 14. INTERVENING/SUPERSEDING CAUSE: Defendants state that Plaintiff's claims  
 14 were caused or made worse by an intervening, supervening and/or superseding event  
 15 or events, including but not limited to actions by other inmates to damage or interfere  
 16 with toilets and/or plumbing systems.

17 15. FAILURE TO MITIGATE: Defendants state that if Plaintiff suffered any injury or  
 18 damages, recovery is barred or mitigated by Plaintiff's failure to mitigate damages,  
 19 including but not limited to Plaintiff Wolfclan's failure to seek medical treatment  
 20 (discovery ongoing) and not timely informing and/or notifying Defendants when an  
 21 alleged backup/overflow incident(s) occurred.

22 **INTERROGATORY NO. 14:** Identify all individuals who have been housed in a cell in

23 Pierce County Jail Cell Block 3 North A from April 4, 2023, to Present. For each, include the  
 24 individual's full name, inmate number, and dates of incarceration at the Pierce County Jail.



ANSWER:

Objection this discovery request exceeds the number of written interrogatories allowed under Rule 33. Objection to the extent that this discovery request is duplicative to Interrogatories No. 8. Additional objection based on RCW 70.48.100 and privacy protection.

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 1.

RESPONSE:

Objection overly broad, beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. In particular, employment and personnel file information is not relevant to the subject litigation, including but not limited to compensation. This request is invasive of the individual Defendant's right to privacy and raises concerns regarding safety of individual Defendants because they are correctional deputies and/or employees of the Pierce County Sheriff Department. Further objection based on attorney-client and/or work product privileges. Please contact defense counsel to discuss limited production subject to protective order.

SUPPLEMENTAL RESPONSE 08/09/2024:

No Documents. Objection to the extent that this discovery requests seeks the same or similar information to Request for Production No. 6. See Request for Production No. 6.

**REQUEST FOR PRODUCTION NO. 2:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 2.

RESPONSE:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and

1 seeks information that would not be relevant to the claims and defenses in this litigation. The  
2 Interrogatory No. 2 is vague as to “maintenance of toilets or plumbing.” Further objection, outside  
3 the scope of class certification question, and the request is disproportionate to the needs of this  
4 case. Further objection, outside the scope of class certification question, and the request is  
5 disproportionate to the needs of this case. Without waiving objections and limiting answer to Jail  
6 location 3NA and the time period of April 8, 2020 to the date of the initial Complaint May 2, 2023:  
7 In order to identify potential responsive information, the discovery request implicates ESI  
8 protocol. Supplement pending ESI protocol finalization.

9 SUPPLEMENTAL RESPONSE 08/15/2024: Without waiving prior objections,  
10 including but not limited to timeframe, Facilities Mgt. Work Order Summary attached as Bates  
11 Number 401902.

12 **REQUEST FOR PRODUCTION NO. 3:** Produce all documents and communications  
13 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 3.

14 **RESPONSE:**

15 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
16 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
17 seeks information that would not be relevant to the claims and defenses in this litigation.  
18 Interrogatory No. 3 is vague as to “maintenance of grievance kiosks systems.” Further objection,  
19 outside the scope of class certification question, and the request is disproportionate to the needs of  
20 this case. Objection to the extent that the discovery request seeks attorney-client and/or work  
21 product. Without waiving objections, and limiting answer to Jail location 3NA and the time period  
22 of April 8, 2020 to the date of the initial Complaint May 2, 2023: This discovery request may be  
23 supplemented.

24 **8/2/24 SUPPLEMENTAL RESPONSE:**

1 No Documents.

2 **REQUEST FOR PRODUCTION NO. 4:** Produce all documents and communications  
3 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 4.

4 **RESPONSE:**

5 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
6 to discovery of admissible evidence. Interrogatory No. 4 is vague as to “complaint,” “sanitation  
7 conditions,” “complaints about plumbing, toilets, sewage, and/or unsanitary conditions.” The  
8 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15.  
9 The request is disproportionate to the needs in this case and seeks information that would not be  
10 relevant to the claims and defenses in this litigation. Further objection, outside the scope of class  
11 certification question, and the request is disproportionate to the needs of this case. Without  
12 waiving objections, the time period of April 8, 2020 to the date of the initial Complaint May 2,  
13 2023: See document produced by Defendant Pierce County identified as follows:

- 14 • GRIEVANCE PROCEDURE  
15 WOLFCLAN DEF PC 400949-400952

16 **REQUEST FOR PRODUCTION NO. 5:** Produce all documents and communications  
17 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 5.

18 **RESPONSE:**

19 The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly  
20 broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible  
21 evidence. The request is disproportionate to the needs in this case and seeks information that would  
22 not be relevant to the claims and defenses in this litigation. Objection to the extent that the  
23 discovery request seeks attorney-client and/or work product. Objection vague as to “complained  
24 about unsanitary living conditions,” “complaints about plumbing, sewage, and/or toilets.” The

discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15, 16, 18. Without waving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

**REQUEST FOR PRODUCTION NO. 6:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 6.

**RESPONSE:**

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Interrogatory No. 6 is overly broad and vague as to “any” capacity. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Further objection, outside the scope of class certification question. Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waving objections, and limiting answer to name and title, Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: No documents to produce.

**8/2/24 SUPPLEMENTAL RESPONSE:**

Objection - the discovery request raises concerns regarding security in the jail and safety to staff and all other individuals in the jail. Without waving objections and limiting answer to Jail location 3NA: Pursuant to Protective Order: See Bates No. 401888-401891.

**SUPPLEMENTAL RESPONSE 08/09/2024:**

Objection regarding Protective Order withdrawn regarding Bates No. 401888-401891.

**SUPPLEMENTAL RESPONSE 08/22/2024:** See documents produced by Defendant

**Pierce County as follows:**

- 1 • **CORRECTIONAL SERGEANT CLASSIFICATION DESCRIPTION**  
WOLFCLAN DEF PC 402066-402069
- 2 • **CORRECTIONS DEPUTY CLASSIFICATION DESCRIPTION**  
3 WOLFCLAN DEF PC 402070-402074
- 4 • **PHYSICIAN/MEDICAL DIRECTOR CLASSIFICATION DESCRIPTION**  
5 WOLFCLAN DEF PC 402075-402078
- 6 • **ADMINISTRATIVE ASSISTANT CLASSIFICATION DESCRIPTION**  
WOLFCLAN DEF PC 402079-402081
- 7 • **MH EVALUATION SPECIALIST CLASSIFICATION DESCRIPTION**  
8 WOLFCLAN DEF PC 402082-402084
- 9 • **MH MANAGER CLASSIFICATION DESCRIPTION**  
WOLFCLAN DEF PC 402085-402087

10 **REQUEST FOR PRODUCTION NO. 7:** Produce all documents and communications  
11 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 7.

12 **RESPONSE:**

13 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
14 to discovery of admissible evidence. Objection Interrogatory No. 7 is overly broad as to “any  
15 portion of the plumbing” and vague as to “each instance,” “inspected, repaired, or replaced.” The  
16 request is disproportionate to the needs in this case and seeks information that would not be  
17 relevant to the claims and defenses in this litigation. Objection to the extent that the discovery  
18 request seeks attorney-client and/or work product. Objection to the extent that this discovery  
19 request is/would be duplicative to Interrogatory No. 9 and Request for Production No. 9. Without  
20 waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020,  
21 to the date of the initial Complaint May 2, 2023: In order to identify potential responsive  
22 information, the discovery request implicates ESI protocol. Supplement pending ESI protocol  
23 finalization.

**REQUEST FOR PRODUCTION NO. 8:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 8.

**RESPONSE:**

The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waiving objections and limiting answer to Plaintiff Wolfclan, see Plaintiff's Jail file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-400518, 400528-400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from his most recent incarceration at the Pierce County Jail identified as follows:

- WOLFCLAN DEF PC 400550-400923

**REQUEST FOR PRODUCTION NO. 9:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 9.

**RESPONSE:**

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Objection Interrogatory No. 9 is overly broad and vague as to "studies and/or cost estimates," "plumbing and/or toilets." Objection to the extent that this discovery request is/would be duplicative to Interrogatory No. 7 and Request for Production No. 7. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May

2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

**REQUEST FOR PRODUCTION NO. 10:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 10.

**RESPONSE:**

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. The discovery request is duplicative to and/or seeks duplicative materials as Requests for Production 27. Objection to the extent that the discovery request seeks attorney-client and/or work product. Objection overly broad and vague as to “cleaning of cells.” Without waiving objections and limiting answer to policy identification: See documents produced by Defendant Pierce County identified as follows:

- JAIL CLEANING POLICIES  
WOLFCLAN DEF PC 400519-400527
- FACILITY HOUSEKEEPING  
WOLFCLAN DEF PC 400926-400929
- POST ORDERS FOR 3 NORTH CLUSTER  
WOLFCLAN DEF PC 400971

**REQUEST FOR PRODUCTION NO. 11:** Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 11.

**RESPONSE:**

Objection assumes facts not in evidence. Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Objection to Interrogatory No. 11 as vague regarding “unsanitary living conditions.” The discovery request

1 also implicates RCW 70.28.100 and privacy protection. Objection to the extent that Interrogatory  
2 No. 11 seeks an admission. Further objection, outside the scope of class certification question,  
3 and the request is disproportionate to the needs of this case. Objection to the extent that the  
4 discovery request seeks attorney-client and/or work product. Without waiving objection, and  
5 limiting answer to Plaintiff Wolfclan, Plaintiff Wolfclan was not denied the ability to submit a  
6 grievance. Plaintiff has provided no evidence to support this allegation. Discovery and  
7 investigation continue.

8 **REQUEST FOR PRODUCTION NO. 12:** Produce all documents and communications  
9 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 12.

10 **RESPONSE:**

11 Objection to the extent that the discovery request seeks attorney-client and/or work product  
12 information or materials. Without waiving objection, see report produced with Defendants' Initial  
13 Disclosures at Bates #400412-400424.

14 **REQUEST FOR PRODUCTION NO. 13:** Produce all documents and communications  
15 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 13.

16 **RESPONSE:**

17 Objection to the extent that the discovery request seeks attorney-client and/or work product  
18 information or materials. Without waiving objection, see Defendants' Initial Disclosures.  
19 Discovery and investigation continue.

20 **REQUEST FOR PRODUCTION NO. 14:** Produce all documents and communications  
21 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 14.

22 **RESPONSE:**

23 The discovery request implicates RCW 70.28.100 and privacy protection. Objection to the  
24 extent that this discovery request is/would be duplicative to Interrogatory No. 8 and Request for



1 Production No. 8. Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not  
 2 likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in  
 3 this case and seeks information that would not be relevant to the claims and defenses in this  
 4 litigation. Objection to the extent that the discovery request seeks attorney-client and/or work  
 5 product. Without waiving objections and limiting answer to Plaintiff Wolfclan, see Plaintiff's Jail  
 6 file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-400518, 400528-  
 7 400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from his most recent  
 8 incarceration at the Pierce County Jail identified as follows:

- 9 • WOLFCLAN DEF PC 400550-400923

10 **REQUEST FOR PRODUCTION NO. 15:** Produce all documents and communications  
 11 between Defendants and any inmates or employees of Pierce County Jail related to issues of  
 12 backflow of toilets, plumbing, sanitation, maintenance or inspection of the same, and/or  
 13 complaints thereof, including submitted grievances or requests to file grievances, from 2012 to  
 14 Present.

15 **RESPONSE:**

16 The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly  
 17 broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible  
 18 evidence. The request is disproportionate to the needs in this case and seeks information that would  
 19 not be relevant to the claims and defenses in this litigation. Objection to the extent that the  
 20 discovery request seeks attorney-client and/or work product. Objection to the extent that the  
 21 discovery request seeks an admission. Objection vague as to "jail related issues of backflow of  
 22 toilets, plumbing, sanitation, maintenance or inspection." The discovery request is duplicative  
 23 and/or seeks duplicative materials as Requests for Production 16, 21, 24, 27. Without waving  
 24 objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of

1 April 8, 2020 to the date of the initial Complaint May 2, 2023: In order to identify potential  
 2 responsive information, the discovery request implicates ESI protocol. Supplement pending ESI  
 3 protocol finalization. See also the following:

- 4 • GRIEVANCE PROCEDURE  
WOLFCLAN DEF PC 400949-400952
- 5 • INMATE CORRESPONDENCE  
6 WOLFCLAN DEF PC 400953-400960

7 SUPPLEMENTAL ANSWER 08/15/2024: To the extent that production to Request  
 8 for Production No. 5 is responsive, see Bates Number 401902.

9 **REQUEST FOR PRODUCTION NO. 16**: Produce all documents and communications  
 10 related to Grievance 554280, Grievance 530542, or any other grievance filed by Plaintiff or any  
 11 other inmate related to sewage, backflow of toilets, sanitation issues, and/or maintenance of the  
 12 same, from 2012 to Present.

13 RESPONSE:

14 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
 15 to discovery of admissible evidence. Plaintiff's request is improper and seeks all documents and  
 16 communications produced and/or relating to prior legal matter Davey v. Pierce Co. et al., Cause  
 17 No. 3:21-cv-05068. See *King Co. v. Merrill Lynch & Co.*, 2011 WL 3438491, at \*3 (cloned  
 18 discovery). The discovery request implicates RCW 70.28.100 and privacy protection. Objection  
 19 vague as to "related to sewage, backflow of toilets, sanitation issues, and/or maintenance." The  
 20 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 4,  
 21 15. The request is disproportionate to the needs in this case and seeks information that would not  
 22 be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery  
 23 request seeks attorney-client and/or work product. Without waving objections and limiting answer  
 24 to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020 to the date of the

1 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery  
 2 request implicates ESI protocol. Supplement pending ESI protocol finalization. See also Plaintiff's  
 3 Jail file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-400518, 400528-  
 4 400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from his most recent  
 5 incarceration at the Pierce County Jail identified as follows:

- 6 • WOLFCLAN DEF PC 400550-400923

7 **REQUEST FOR PRODUCTION NO. 17:** Produce documents (including but not limited  
 8 to shift schedules or time sheets) sufficient to show which correctional officers and/or other  
 9 officers or guards or other employees were assigned to work in the 3 North A Unit of Pierce County  
 10 Jail each day from 2012 to Present.

11 **RESPONSE:**

12 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
 13 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
 14 seeks information that would not be relevant to the claims and defenses in this litigation. Objection  
 15 vague as to "documents...sufficient to show...". Further objection, the discovery request is outside  
 16 the scope of class certification question. Objection to the extent that the discovery request seeks  
 17 information related to employment outside of Pierce County, including but not limited to  
 18 NaphCare workers, and such information would not be in the care, custody or control of the  
 19 Defendants. Without waving objections and limiting answer to Pierce County employees, Jail  
 20 location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2,  
 21 2023: This discovery request will be supplemented.

22 **SUPPLEMENTAL RESPONSE 08-22-2024:** See documents produced by  
 23 Defendants Pierce County as follows:

- 24 • 3N CD ASSIGNMENTS DAY SHIFT

1           **WOLFCLAN DEF PC 401903-401967**

- 2           • **3N CD ASSIGNMENTS GRAVE SHIFT**  
3           **WOLFCLAN DEF PC 401968-402001**
- 4           • **3N CD ASSIGNMENTS SWING SHIFT**  
5           **WOLFCLAN DEF PC 402002-402065**

6           **REQUEST FOR PRODUCTION NO. 18:** Produce all records related to Plaintiff,  
7 including but not limited to, disciplinary, medical, grievances, commissary, and/or any other  
8 records related to Plaintiff from any period in which he was detained at Pierce County Jail.

9           **RESPONSE:**

10           Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
11 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
12 seeks information that would not be relevant to the claims and defenses in this litigation. The  
13 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15,  
14 26, 27, 30. Without waiving objections, see Defendants' Initial Disclosure, Plaintiff Jail file at  
15 Bates stamp 400001-400400, 400425-400518, 400528-400532, and 400543-400546.  
16 Additionally, see Plaintiff Wolfclan's Jail file from his most recent incarceration at the Pierce  
17 County Jail identified as follows:

- 18           •       **WOLFCLAN DEF PC 400550-400923**

19           See also, Request for Production No. 30 regarding Plaintiff Wolfclan phone calls.

20           **REQUEST FOR PRODUCTION NO. 19:** Produce a map or layout of Pierce County  
21 Jail that shows all of the units, cells, and locations of each toilet.

22           **RESPONSE:**

23           Objection the discovery request raises concerns regarding security in the jail and safety to  
24 staff and all other individuals in the jail. Without waiving objections and limiting answer to Jail  
location 3NA: Please contact defense counsel to discuss response subject to protective order.

1 8/2/24 SUPPLEMENTAL RESPONSE:

2 Pursuant to Protective Order: See Bates No. 401900-401901

3 **REQUEST FOR PRODUCTION NO. 20:** Produce all documents and communications  
4 related to the design, installation, maintenance, inspection, and/or replacement of any portion of  
5 the plumbing at Pierce County Jail since 1985 to Present.

6 RESPONSE:

7 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
8 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
9 seeks information that would not be relevant to the claims and defenses in this litigation. Objection  
10 to the extent that the discovery request implicates RCW 70.28.100 and privacy protection.  
11 Objection vague as to “design, installation, maintenance, inspection, and/or replacement of any  
12 portion of the plumbing.” The discovery request is duplicative and/or seeks duplicative materials  
13 as Requests for Production 2, 15, 16, 24. Objection to the extent that the discovery request seeks  
14 attorney-client and/or work product. Objection the discovery request raises concerns regarding  
15 security in the jail and safety to staff and all other individuals in the jail. Without waiving  
16 objections and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the  
17 date of the initial Complaint May 2, 2023: In order to identify potential responsive information,  
18 the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.  
19 Please contact defense counsel to discuss response subject to protective order.

20 8/2/24 SUPPLEMENTAL RESPONSE:

21 Pursuant to Protective Order: See Bates No. 401892-401899

22 **REQUEST FOR PRODUCTION NO. 21:** Produce all documents and communications  
23 related to the backflow of toilets, sewage issues, sanitation issues, or the living or working  
24 conditions created thereby, at Pierce County Jail since 2012 to Present.

RESPONSE:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy protection. Objection vague as to “backflow of toilets, sewage issues, sanitation issues, or the living or working conditions created thereby.” Further objection, outside the scope of Plaintiff’s claims and the scope of class certification question, including but not limited to “working conditions.” The request is also disproportionate to the needs of this case. Objection to the extent that the discovery request seeks attorney-client and/or work product. The discovery request is duplicative to and/or seeks duplicative materials as Requests for Production 15, 16, 24, 27. Without waiving objections, and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

SUPPLEMENTAL ANSWER 08/15/2024: To the extent that production to Request for Production No. 5 is responsive, see Bates Number 401902

**REQUEST FOR PRODUCTION NO. 22:** Provide all documents and communications related to the two lawsuits filed in 2012 against Pierce County regarding toilet issues at Pierce County Jail (*Meyer-Clemmons v. Karr*, No. C11-5603-RBL-JRC, 2012 WL 709596 (W.D. Wash. Feb. 3, 2012); *Steele v. Kerr*, No. C11-5793-BHS-JRC, 2012 WL 710096 (W.D. Wash. Jan. 31, 2012)).

RESPONSE:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Plaintiff’s request is improper and seeks all documents and

communications produced and/or relating to prior legal matters. See *King Co. v. Merrill Lynch & Co.*, 2011 WL 3438491, at \*3 (cloned discovery). Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy protection. Further objection, outside the scope of class certification question. Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waiving objections: Both cases dismissed on Fed. R. Civ. P. 12(b)(6) and pleadings available through the Federal Public Access to Court Electronic Records (PACER) service.

**REQUEST FOR PRODUCTION NO. 23:** Provide all documents and communications related to the plumber “Jason” who was sent to Plaintiff’s cell to snake his toilet on or around December 18, 2020.

**RESPONSE:**

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. The discovery request is duplicative to and/or seeks duplicative materials as Requests for Production 2, 7, 15, 20. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy protection. Further objection, outside the scope of class certification question. Objection vague as to “plumber ‘Jason’.” Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waiving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

**REQUEST FOR PRODUCTION NO. 24:** Produce all documents and communications between Ms. or Mrs. Herbison, who upon information and belief was an Officer or Cluster Officer

1 in 2021, and any inmates or employees of Pierce County Jail related to sewage issues, toilet  
2 backflow issues, sanitation issues, and maintenance regarding the same, from 2012 to Present.

3 RESPONSE:

4 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
5 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
6 seeks information that would not be relevant to the claims and defenses in this litigation. The  
7 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production  
8 15. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy  
9 protection. Further objection, outside the scope of class certification question. Objection vague as  
10 to “sewage issues, toilet backflow issues, sanitation issues, and maintenance regarding the same.”  
11 Objection to the extent that the discovery request seeks attorney-client and/or work product.  
12 Without waiving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the  
13 time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify  
14 potential responsive information, the discovery request implicates ESI protocol. Supplement  
15 pending ESI protocol finalization.

16 **REQUEST FOR PRODUCTION NO. 25:** Provide all documents and communications  
17 related to Plaintiff’s transfer to or from any unit and/or any cell within a unit in Pierce County Jail  
18 between April 4, 2022, and Present.

19 RESPONSE:

20 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
21 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
22 seeks information that would not be relevant to the claims and defenses in this litigation. The  
23 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production  
24 18. Further objection, outside the scope of class certification question. Objection to the extent that



1 the discovery request seeks attorney-client and/or work product. Without waiving objections:  
2 Plaintiff's Jail file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-  
3 400518, 400528-400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from  
4 his most recent incarceration at the Pierce County Jail identified as follows:

- 5 • WOLFCLAN DEF PC 400550-400923

6 In order to identify potential responsive information, the discovery request implicates ESI  
7 protocol. Supplement pending ESI protocol finalization.

8 **REQUEST FOR PRODUCTION NO. 26:** Provide all documents and communications  
9 related to any discipline or disciplinary proceeding to which Plaintiff was subject at any point  
10 during any incarceration in Pierce County Jail.

11 **RESPONSE:**

12 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
13 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
14 seeks information that would not be relevant to the claims and defenses in this litigation. The  
15 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production  
16 18, 27. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy  
17 protection. Further objection, outside the scope of class certification question. Objection to the  
18 extent that the discovery request seeks attorney-client and/or work product. Without waiving  
19 objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of  
20 April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential  
21 responsive information, the discovery request implicates ESI protocol. Supplement pending ESI  
22 protocol finalization.

23 **REQUEST FOR PRODUCTION NO. 27:** Provide all documents and communications  
24 related to any discipline or disciplinary proceeding to which any detainee or inmate was subject at

1 any point while detained or incarcerated at Pierce County Jail in any way related to cleaning  
2 supplies (or lack thereof), plumbing issues, toilet backflow or other malfunction, or  
3 complaints/grievances, whether formal or informal, made about any of the aforementioned topics.

4 RESPONSE:

5 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
6 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
7 seeks information that would not be relevant to the claims and defenses in this litigation. The  
8 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production  
9 4, 15, 18, 26. Objection to the extent that the discovery request implicates RCW 70.28.100 and  
10 privacy protection. Objection to the extent that the discovery request seeks an admission. Further  
11 objection, outside the scope of class certification question. Objection vague as to “cleaning  
12 supplies (or lack thereof), plumbing issues, toilet backflow or other malfunction, or  
13 complaints/grievances whether formal or informal...” Objection to the extent that the discovery  
14 request seeks attorney-client and/or work product. Without waiving objections and limiting answer  
15 to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020, to the date of the  
16 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery  
17 request implicates ESI protocol. Supplement pending ESI protocol finalization.

18 **REQUEST FOR PRODUCTION NO. 28:** Provide any report, summary, or other  
19 document regarding whether any aspect of the plumbing at Pierce County Jail (or portion thereof)  
20 is compliant with any applicable regulation, code, ordinance, or other legal requirement.

21 RESPONSE:

22 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead  
23 to discovery of admissible evidence. The request is disproportionate to the needs in this case and  
24 seeks information that would not be relevant to the claims and defenses in this litigation. The

discovery request is duplicative to and/or seeks duplicative materials as Requests for Production 29. Objection vague as to “report, summary, or other document,” “complaint with any applicable regulation, code, ordinance, or other legal requirement.” Without waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

**REQUEST FOR PRODUCTION NO. 29:** Provide all documents and communications related either to (1) any report, summary, or other document any report, summary, or other document regarding whether any aspect of the plumbing at Pierce County Jail (or portion thereof) is compliant with any applicable regulation, code, ordinance, or other legal requirement, or (2) the preparation or drafting of any such report, summary, or other document.

**RESPONSE:**

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. The discovery request is duplicative to and/or seeks duplicative materials as Requests for Production 28. Objection vague as to “related,” “report, summary, or other document any report, summary, or other document,” “any aspect of the plumbing,” “preparation or drafting...” Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

**REQUEST FOR PRODUCTION NO. 30:** Provide a copy of any transcript and/or audio recording of Plaintiff Wolfclan’s telephone calls from April 4, 2023, to August 15, 2023.

RESPONSE:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request seeks information that would not be relevant to the claims and defenses in this litigation. Further objection, outside the scope of class certification question. Without waiving objections: Audio recordings attached.

**REQUEST FOR PRODUCTION NO. 31:** Provide a copy of all documents and communications related to the inspection of Cell Block 3 North A on or around April 26, 2023.

RESPONSE:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy protection. The discovery request is duplicative to and/or seeks duplicative materials as other discovery requests. Objection to the extent that the discovery request seeks attorney-client and/or work product. Without waiving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

**REQUEST FOR PRODUCTION NO. 32:** Provide a copy of all documents and communications referencing or related to the October 1, 2014, Main Jail Water Closet Replacement Pre-Design report created by Hultz BHU Consulting Engineers, Inc.

RESPONSE:

Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request seeks information that would not be relevant to

1 the claims and defenses in this litigation. Objection to the extent that the discovery request seeks  
2 attorney-client and/or work product. Without waiving objections and limiting answer to the time  
3 period of April 8, 2020, to the date of the initial Complaint May 2, 2023: No documents.

4 DATED this 22<sup>nd</sup> day of August, 2024.

5 MARY E. ROBNETT  
6 Pierce County Prosecuting Attorney

7 s/ FRANK A. CORNELIUS  
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9 Deputy Prosecuting Attorney / Civil  
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14  
15 **CERTIFICATE OF SERVICE**

16 On August 22, 2024, I hereby certify that I electronically sent the foregoing PLAINTIFF  
17 ECHOTA WOLCLAN'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION  
18 TO DEFENDANTS AND FOURTH SUPPLEMENTAL ANSWERS THERETO RE:  
19 INTERROGATORY NO. 2, REQUEST FOR PRODUCTION NO. 2, REQUEST FOR  
20 PRODUCTION NO. 15, AND REQUEST FOR PRODUCTION NO. 21 to the following:

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